

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Dajovan Pettit.,

Case No. 0:23-cv-02789-JWB-
JFD

Plaintiff,

v.

Allina Health System, a non-profit
domestic corporation d/b/a
Abbott-Northwestern Hospital

Defendant.

AFFIDAVIT OF RICH HECHTER

I, Richard W. Hechter, after being first duly sworn, state and depose as follows:

1. That I am an Attorney who is licensed in State and Federal Court of Minnesota and in the 8th Circuit Court Of Appeals.
2. That I have been representing Plaintiff in this instant action
3. That after Plaintiff's deposition in August, a conflict developed between myself, my law firm and Plaintiff.
4. That I believe I should only disclose the actual conflict in camera with the Court as I would never want to prejudice my client in anyway possible.
5. That the attached emals are true and accurate copies of what they purport to be.

6. The purpose of the emails is to confirm the constant contact I had with Plaintiff and the initial date told Plaintiff I had to withdraw. That date was September 24, 2024, with several follow-up emails and calls informing Plaintiff she needs to find a new attorney to take over the case. She (Plaintiff) has also been served with the motion papers and notice of Withdrawal.
7. I swear and affirm that everything is true and accurate to the best of my knowledge and subject to the laws of Perjury.

s/s Rich Hechter

Respectfully submitted,

Dated: October 15, 2024

/s/ Rich Hechter

Richard W. Hechter, (# 193537)
7380 France Avenue South, Suite 250
Edina, MN 55435
Telephone: (952) 832-2000
Email: rhechter@morrislawmn.com

MORRIS LAW GROUP, P.A.
7380 France Avenue South, Suite 250
Edina, MN 55435
Telephone: (952) 832-2000

Attorneys for Plaintiff DaJovan Pettit

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on Oct. ~~16~~⁶, 2024, a true and correct copy of the foregoing was served via transmission of Notice of Electronic Filing generated by CM/ECF on all counsel of record on the below Service List.

SERVICE LIST

Copies furnished to:

Lehoan T. Pham,
Bar No. 0397635
LITTLER MENDELSON, P.C.
1300 IDS Center
80 South 8th Street
Minneapolis, MN 55402
Telephone: 612.630.1000
hpham@littler.com
Attorney for Deffendant

Dajovan B. Pettit
2219 Dupont Avenue North
Minneapolis, MN 55411
Telephone: 612-481-5788
dajovan@gmail.com
Plaintiff

Richard W. Hechter

From: Richard W. Hechter
Sent: Thursday, August 22, 2024 5:37 PM
To: Edify My temple; Griffin Bryant; Richard Morris
Cc: Richard W. Hechter
Subject: YOUR DEPOSITON

Dear Dalovan:

Thank you so much for attending your extremely long deposition (7 hours). [REDACTED]
 30 pages of notes and here are the main items I noted:

You have great credentials. You graduated from St. Kates. Excellent school. You came across as extremely honest and sincere. You were very clear in your communications. [REDACTED] You looked right into the video camera and gave Allina [REDACTED]
 Heck then [REDACTED]

You did a great job giving your employment history and your time in the cardiac until The telemetry monitoring stations, titrating drips, etc. You did a fantastic job naming specific people such as [REDACTED] and [REDACTED] (sorry if I spelled those wrong). You did a good job explaining your goal of becoming a nurse mid-wife. After some questioning by me at the end, we established being a midwife would be considered a big "promotion" or career advancement. At the end, with my questioning, You did a nice job explaining why holding you on 44-4500 and not going to Labor and Delivery prevented you from getting clinical hours to be applied toward a graduate degree in Midwifing.

You did a great job explaining the atmospheres (culture) in different units and how on specialty units, nurses of color were rare and frowned upon. You were specific stating "[REDACTED]" (last name not known) did not like you and did not want nurses of color there. You explained how they would wash nurses out (get them to quit or be removed from the clinical learning) by making sure they needed "remediation". You did an excellent job explaining how management and charge nurses and those in the culture set you and black nurses up to fail.

You were specific on [REDACTED]s. You testified she would not look at you, gave you unsafe assignments, some risking your nursing license, that you and black nurses were generally assigned the most difficult patients and often had to do jobs more akin to a CNA. You did a fantastic job explaining how, as a nurse, you need other nurses to back you up and have your back. You explained how black nurses did not have this. I found it powerful when you testified that black nurses would often take less than desirable assignments (i.e. Sister Kenny) just to be with black nurses. Safety and comfort in numbers. I thought that was very insightful and hard hitting.

I have in my notes you mentioned [REDACTED]. Again, naming specific people and [REDACTED] (last name not known). You told Allina that you were asked if any of your kids were from the same father. You mentioned nair comments like "ghetto". You talked about [REDACTED] and her reports to [REDACTED] [REDACTED], which went nowhere. You testified that there were "equity investigations" which also went no where. You did a great job explaining how they / Allina sent discrimination complaints to some department where they die.

You explained how black nurses were followed. You mentioned [REDACTED]. How white nurses would not chart when relieving a black nurse on a break. You talked about how white nurses got "cohesive training". You explained there was no continuity with training for black nurses. You testified that you heard [REDACTED] things like "you f@@@ in blacks and how their food stank. You heard [REDACTED] things like black aids are lazy. You explained how white nurses would stand beside you (sandwich you) and yell over your head – literally). You explained that black nurses were isolated and not really accepting into lunch and break groups with white nurses. You did an A+ job mentioning [REDACTED] "systemic racism". You mentioned [REDACTED]s. I don't have much on notes here. Remember, we will get the full

300 page transcript soon. You told Allina that some employees would use the word Nigga. There was a good chunk of time spent (by the defense attorney) discussing Nigga versus Nigger and what you really heard and why the Complaint (drafted by me) said Nigger. I did not really understand or "hear" literally, the difference between nigga and nigger before your deposition. I am sorry to use that language. I know it is not godly.

You talked about how white nurses and those who supervise "hide" (spy) and try to catch black nurses off task, etc. You testified that [REDACTED] followed Aides and made it very hard for taking breaks. Only with black nurses/nursing aids.

You talked about [REDACTED] employee relations consultant, who knew there were complaints of systemic racism. I loved how you explained that not reprimanding discriminatory behavior EMBOLDENED those to do more. I get that completely.

You talked about huddles and some white person mocking you stating you should eat watermelon fried chicken and later you added corn bread. You found this very offensive. You saw those who came forward to try and report racism got punished and retaliated by their supervisors. You needed to keep your job. You identified [REDACTED] and [REDACTED] as charge nurses and those in supervisory capacity on the short stay unit. You testified [REDACTED] was the actual manager of your unit. That you and others had a "bad" relationship with him. You explained that one time, outside of Abbott, he lurched at you and you were physically afraid. That [REDACTED] could only talk to white nurses and ignored black nurses. He did not want black nurses on his unit. You also mentioned [REDACTED] for those who also had experienced discrimination and difficulty with Joe Rausch. You testified that Joe often "seethed" at you.

You did a good job testified that nurses of color were looked up with suspicion. That in investigations, the management, HR, never believed black nurses and black nurses, including you, were often criticized or written up for subjective offensive behavior. You talked about [REDACTED] and Josie [REDACTED], the collusion between all. You, of course, did a fantastic job about the lies cast upon you, how [REDACTED] broke his promise and refused to let you transfer off the unit to Labor and Delivery – which had 4 openings at the time. That it was agreed by [REDACTED] and [REDACTED] that you could leave and you had your orientation scheduled. That this got pulled from you after the "4 butters" incident.

From an outsiders (mine) view, it is ridiculous that the 4 butters report was ever created and you had to go to HR for it. I have never heard such pettiness. You explained the hostile work environment and specifically named [REDACTED] and a few others. That Allina never meant to keep their promise to let you, a black nurse, transfer. You explained the lies people would conjure up against black nurses and there was never any investigations. That [REDACTED] did interview those on shift [REDACTED] and [REDACTED] what you [REDACTED] you gave some limited testimony about Joe [REDACTED] (I know the spelling is not correct). You mentioned you were at times questioned about your Locks/hair/ natural hair. You explained how Allina and supervisors [REDACTED] could create positions for white nurses. You explained that very qualified nurses were jumped over for positions. You mentioned [REDACTED] as knowing problems with [REDACTED] you also discussed how Allina would not accommodate your pregnancy restrictions/DVT. Patient care issues. Unsafe assignments. They would not give you a sitting job (i.e. charting, paperwork in the "basement" but they would allow white nurses to avoid direct care when they had restrictions.

You spoke about [REDACTED] and nurses of color. You mentioned [REDACTED] and MNA. How MNA knew there was systemic racism but had no power to do anything about it. You explained how at one discipline meeting/investigatory interview, an Allina employee lied to you and said you are not entitled to MNA representation. Was that [REDACTED]? I noticed you said there were 3 meetings at times for discipline issues. Why were there 3 meetings. That seems, from an outsider, very onerous and punishing. Can you help me understand that? Thanks. You testified for a good chunk of time (due to the questions of Allina's attorney) about some improvement plan which had 3 versions you were aware of. Please clarify that for me. You explained one had a redacted or blacked

out type at the bottom of the page. Again, can you please help clarify that. I am waiting for Allina to give me their documents. You mentioned [REDACTED] who did an improper investigation. Was that the butter incident.

The butter incident went on for countless minutes. The way I understand it from your testimony, [REDACTED] reported the incident even though the butter comment was NOT directed at her. It was involving [REDACTED] aide. There was a mention of [REDACTED] involved somehow. My notes don't really capture that. Maybe you can confirm what [REDACTED] did. You did mention that one witness could NOT have seen what happened as she was behind a pillar type thing/construction of how the unit was.

You mentioned a [REDACTED]

*Throughout your deposition you never heard actual racial slurs. . It got subjective quickly as there was some misunderstanding between hair and food comments and the Ngga and er words. You did testify that you never heard a supervisor or [REDACTED] say a racial slur (what ever that is subjectively). You testified that complaints of discrimination went to corporate compliance to die.

You mentioned [REDACTED] as the DEI director but nothing really changed.

There was a lot of talk about [REDACTED] lawsuit and his complaint. I will get to that shortly.

[REDACTED]

You mentioned a pink badge, but said you only knew of one nurse or aide to wear it (sign of surviving discrimination at one unit).

The attorney asked for the names of your witnesses for pain and suffering. You gave your children, your husband and your dad. That's good. You told the attorney about your couple of visits to [REDACTED] and to B [REDACTED] health **** I loved how you told Allina that you get spiritual healing and treatment, and not medical as you no longer trust the establishment. [REDACTED]

I loved how you said you were like free falling without a parachute and how the experience totally negatively affected your self-esteem, ability to be a great nurse, etc. [REDACTED] You described no sleep, change in personality, depression, anxiety, etc. That Allina took away your confidence. Again, [REDACTED] you seek spiritual care and not psychiatric care. Good for you [REDACTED]

You did a good job explaining "burnout". You did a good job explaining why you have not looked for work or gone back to work since Allina. You explained that Allina black-balled people. My guess is, they would not give any references and impliedly said things to make you look like a bad candidate (allegedly, not fact). You also explained how the accommodations did not work for you, and how white nurses got the shift changes they wanted.

You mentioned a [REDACTED] fired for integrity line calls. You testified how you felt you and black nurses were set up all the time and that the white staff kept tabs, notes and tallies to be used against you and nurses of color and in the end, they all were about subjective notions of rudeness and disrespect. Cultures communicate differently and you did a good job testifying that Allina never did inclusivity training, etc. to understand differences in communication styles.

I loved how you testified how nurses of color did not want to be Seen. That was powerful.

Now, the concerns, as your attorney. Again,,

After your deposition, you signed forms to allow Allina's attorneys to get your records from [REDACTED]. This is fine and totally in-bounds. We also discussed the fact that Allina wants us to present a settlement number before August 27, 2024. They ARE interested in settlement but the number has to be within what Allina (their attorneys) feel is fair. [REDACTED]

e. [REDACTED] and
[REDACTED] you ask [REDACTED] board.

...conservative and typically

5151

I loved how you testified how nurses of color did not want to be Seen. That was powerful.

[REDACTED] The drafting of the complaint goes back a long time ago and was based upon all of the information I had at the time, lots of the evidence and paperwork I had at the time, and what others were saying in general about racism and problems with Abbott. When I wrote you heard racial slurs (you testified you heard nigga), you said you never did and that the mention in the complaint was not true.

I know the attorney asked why you put numbers in initial "disclosures" suffering. You did fine and these were really inappropriate questions.

As we discussed, your case is still [REDACTED] and moving through the system. The race discrimination charges

After your deposition, you signed forms to allow Allina's attorneys to get your records from [REDACTED]. This is fine and totally in-bounds. We also discussed the fact that Allina wants us to present a settlement number before August 27, 2024. They ARE interested in settlement but the number has to be within what Allina (their attorneys) feel is fair. Settlements by their nature, like nursing contracts, end up being big compromises for each side. If [REDACTED] could not pay BNs \$80.00 an hour, but instead, they have to settle for \$47.00 an hour (just an example, [REDACTED]). If the number is too high, Allina will [REDACTED].

All attorneys can do is look at the countless cases that have gone before you and see what jurors awarded (across the country but Minnesota/federal court most specifically) and look at the risk of getting nothing or getting a judge to dismiss the entire case on summary judgment. [REDACTED]

Thus, when arriving at a starting number, it has to be objectively fair in relation to other cases and the risk of getting nothing by a judge tossing the case out – so [REDACTED] discrimination against you specifically. [REDACTED]

My suggestion is that we [REDACTED]. If we got to a jury and proved our case and they (jury) awarded punitive damages, [REDACTED] did a great job for us. We are building a good case but we need to prove [REDACTED] was discriminatory and/or allowed discrimination to grow and fester under him. The courts clearly say a few incidents of racial slurs and bad behavior is not pervasive racism changing the terms and conditions of employment.

The decision is ultimately yours and I will always respect that. It's tough as you fight so hard. My final thoughts as I tell all of my clients. There are 2 main regrets with lawsuits. 1. You settle and kick yourself for not going all the way to a trial – if you can get that far. 2. You go to trial and lose and regret not settling and winning. Getting Abbott/Allina to pay [REDACTED] will definitely help nurses of color as Abbott does not want to be continually sued. IT will lead to true DEI training. [REDACTED]

Again, most is from my notes and memory.. The real transcript will be here in about 2 weeks or less. [REDACTED]

Richard W. Hechter

From: Richard W. Hechter
Sent: Monday, August 26, 2024 3:08 PM
To: Edify My temple
Cc: Griffin Bryant
Subject: Update, Rich
Attachments: Verdicts.pdf



Hi DaJavon,

I am attaching some verdicts after trials. [REDACTED]

Every case is different and your case is different. BUT, you have to look at the landscape and court rulings. Again, see what I attached. [REDACTED]

You told me you had a couple firms look into your case [REDACTED]
your case. [REDACTED]

My office can not bank on your belief that "god" will have us win the case. [REDACTED]
(depositions, court filing fees, etc.) [REDACTED]

On a side note, you now say do not call [REDACTED]

Rich

Board Certified Civil Trial Specialist, MSBA
MORRIS LAW GROUP, P.A.
7380 France Avenue S., Suite 250
Edina, MN 55435
Tel: (952) 832-2000
Fax: (952) 832-0020
rhechter@morrislawmn.com
www.morrislawmn.com



MORRIS LAW GROUP, P.A.

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Richard W. Hechter

From: Richard W. Hechter
Sent: Tuesday, September 24, 2024 9:09 AM
To: Edify My temple
Cc: Griffin Bryant
Subject: So sorry.
Attachments: 2024.09.19 Case Withdrawl Letter.docx



Hi Dajavon,

Thank you for speaking with me. I am so sorry to give you the news. My office will NOT let me continue on. [REDACTED]

*** You need to do your best to find another attorney immediately. I will send you a list of attorneys to check with. You have some time.

[REDACTED]

Please see attached.

Richard W. Hechter
Board Certified Civil Trial Specialist, MSBA
MORRIS LAW GROUP, P.A.
7380 France Avenue S., Suite 250
Edina, MN 55435
Tel: (952) 832-2000
Fax: (952) 832-0020
rhechter@morrislawmn.com
www.morrislawmn.com



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Richard W. Hechter

From: Edify My temple <dajovan@gmail.com>
Sent: Thursday, October 3, 2024 1:41 PM
To: Richard W. Hechter
Cc: Griffin Bryant
Subject: Re: FW: Your case
Attachments: image001.jpg

Categories: Filed to Clio



There's no need to call me, [REDACTED]. I will proceed as Pro Se. Have Lehoan send everything to me. You are not allowed [REDACTED]

On Thu, Oct 3, 2024, 1:07 PM Richard W. Hechter <rhechter@morrislawmn.com> wrote:

Dear Dalavon,

I have not found any attorney willing to take on your case. Have you? Below is the email I received from the defense attorney. I was prolonging the time to actually withdraw in hopes you could find another attorney.

We are coming up to a CRITICAL DEADLINE. Defense counsel for Allina will seek money judgment against you [REDACTED]

I would like your permission to [REDACTED] and my [REDACTED] not let [REDACTED]

I pushed Allina as far as possible. The [REDACTED]

Please give me permission [REDACTED]

Sincerely,

Richard W. Hechter

From: Richard W. Hechter
Sent: Friday, October 4, 2024 2:59 PM
To: Edify My temple
Cc: Griffin Bryant
Subject: Final email
Attachments: 2024.10.04 Motion.pdf; 2024.10.04 Order to withdraw (003).pdf

Dear Dajavon,

I am so sorry we had to withdraw. I am attaching the documents we sent to the court and Allina's attorney. I wish you so much luck and, most importantly, peace.

Sincerely,

Rich Hechter

Richard W. Hechter
Board Certified Civil Trial Specialist, MSBA
MORRIS LAW GROUP, P.A.
7380 France Avenue S., Suite 250
Edina, MN 55435
Tel: (952) 832-2000
Fax: (952) 832-0020
rhechter@morrislawmn.com
www.morrislawmn.com



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Richard W. Hechter

From: Richard W. Hechter
Sent: Monday, October 7, 2024 3:11 PM
To: Edify My temple
Subject: FW: Pettit v. Allina | Service of Rule 11 Safe Harbor
Attachments: Allina - Pettit - Letter to OC (Service of Rule 11 Motion Papers) 4882-4052-1703 2.pdf; Allina-Pettit - Motion for Rule 11 Sanctions 4884-4814-1799 2.pdf; Allina-Pettit - NOH Rule 11 Sanctions 4863-7556-4519 2.pdf; Allina-Pettit - MOL ISO Rule 11 Sanctions 4874-4542-1027 5.pdf; ALLINA-Pettit - Word Count Certificate w MTN for Sanctions 4870-6835-0951 2.pdf; Fourth Pham Decl ISO Rule 11 Motion 4877-2764-0294 2.pdf; Allina-Pettit - Proposed Order Rule 11 Sanctions 4874-8528-6119 2.pdf; Allina-Pettit - COS for Rule 11 Motion Papers 4883-0330-5447 2.pdf

Dear DaJavon,

The defense attorney is adamant for bringing big fines and sanctions against you. I can not stop it. [REDACTED]
[REDACTED] y. [REDACTED]
[REDACTED] w. I am happy to do telephone conferences with any other attorney considering [REDACTED]
[REDACTED]. Pro-se is a tough route in federal court. Please review the attached. I just spoke with Hahns, the attorney for Allina and he wants fees and costs from you.

I [REDACTED] I am asking the court to withdraw as your attorney because [REDACTED] Please let me know no later than Friday if [REDACTED]

Sincerely,

Rich Hechter

Richard W. Hechter
Board Certified Civil Trial Specialist, MSBA
MORRIS LAW GROUP, P.A.
7380 France Avenue S., Suite 250
Edina, MN 55435
Tel: (952) 832-2000
Fax: (952) 832-0020
rhechter@morrislawmn.com
www.morrislawmn.com



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Richard W. Hechter

From: Richard W. Hechter
Sent: Monday, October 7, 2024 3:34 PM
To: Edify My temple
Subject: FW: Pettit case



Hello,

Here is the email from now from Hahn Pham. I have to keep you in the loop.

Best,

Rich

Richard W. Hechter
Board Certified Civil Trial Specialist, MSBA
MORRIS LAW GROUP, P.A.
7380 France Avenue S., Suite 250
Edina, MN 55435
Tel: (952) 832-2000
Fax: (952) 832-0020
rhechter@morrislawmn.com
www.morrislawmn.com



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From: Pham, Lehoan T. <HPham@littler.com>
Sent: Monday, October 7, 2024 3:28 PM
To: Richard W. Hechter <rhechter@morrislawmn.com>
Cc: Robbins, Holly <HRobbins@littler.com>; Huisman, Stephanie <SHuisman@littler.com>
Subject: RE: Pettit case



Hello Rich:

Thanks for your call today. I write to summarize what we talked about. Where I have stated something incorrect, please let me know.

Allina will withdraw its Motion Seeking Leave to Directly Serve Ms. Pettit. We will file the required notice with the Court. Allina will represent that you do not object to the withdrawal of the motion.

Richard W. Hechter

From: Richard W. Hechter
Sent: Tuesday, October 8, 2024 11:25 AM
To: Edify My temple
Subject: FW: Pettit v. Allina 23-2789; MANDATORY COURT HEARING IN PERSON, NOVEMBER 5, 2024 AT 11:00 A.M.

Dear DaJovan,

Here, below is the email from the court.

There is a MANDATORY court hearing for everyone (including you) to attend on your case. It is on November 5, 2024 at 11:00 a.m. in person at the down town St. Paul Courthouse.

The hearing will be a combination of things including how you wish to proceed after my withdrawal, and a discussion of how Allina wants to move forward with it's sanctions and attorneys fees.

I am sorry, again, I can't go further. I would strongly suggest continuing to try to find a new attorney by November 5th.

Thanks.

Rich

Richard W. Hechter
Board Certified Civil Trial Specialist, MSBA
MORRIS LAW GROUP, P.A.
7380 France Avenue S., Suite 250
Edina, MN 55435
Tel: (952) 832-2000
Fax: (952) 832-0020
rhechter@morrislawmn.com
www.morrislawmn.com



MORRIS LAW GROUP, P.A.

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From: MND Docherty Chambers <docherty_chambers@mnd.uscourts.gov>
Sent: Monday, October 7, 2024 4:23 PM
To: Pham, Lehoan T. <HPham@littler.com>; Richard W. Hechter <rhechter@morrislawmn.com>
Cc: Griffin Bryant <Griffin.Bryant13@outlook.com>
Subject: RE: Pettit v. Allina 23-2789;



MORRIS LAW GROUP, P.A.

RICHARD L. MORRIS
RICHARD W. HECHTER *
AMY MATTSON
JASON EMERY
DAN YATES
PATRICK ZITEK
ANDREW RATELLE

ATTORNEYS AT LAW
A PROFESSIONAL ASSOCIATION

7380 FRANCE AVENUE S., SUITE 250
EDINA, MN 55435

TELEPHONE: (952) 832-2000
FACSIMILE: (952) 832-0020
WWW.MORRISLAWMN.COM

* MSBA Certified Civil Trial Specialist

October 16, 2024

Ms. DaJavon Pettit
2219 Dupont Avenue North
Minneapolis, MN 55411

RE: Notice of Withdrawal. Please read carefully. Extremely Important

Dear DaJavon:

I hope, as always, all is going well with you and your beautiful family.

I need to inform you that the Defense attorneys are now threatening to bring more sanctions and fees against you and my law firm; and will move again to dismiss your case. Their bases are essentially

The legal issue has always been what happened to you,

The court is giving you about 60 days to find a new attorney.

Thus, you MUST do your best to find a new attorney to substitute in. Otherwise, you'll have to go it on your own (which is extremely hard in Federal Court)

_____ has several attorneys in the past would not accept _____ to _____ but you can NOT rely on this. You will also have to start looking on your own.

I am so sorry to give you this news. There is NO charge to you for the hours and hard costs we put into your case [REDACTED]. With the case law and the Minnesota Federal Court/8th Circuit [REDACTED]

[REDACTED] size

[REDACTED] nss: [REDACTED] file

Richard W. Hechter
Board Certified Civil Trial Specialist, MSBA
MORRIS LAW GROUP, P.A.
7380 France Avenue S., Suite 250
Edina, MN 55435
Tel: (952) 832-2000
Fax: (952) 832-0020
rhechter@morrislawmn.com
www.morrislawmn.com



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